

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

United States Courts  
Southern District of Texas  
FILED

JUN 23 2016

David J. Bradley Clerk of Court

UNITED STATES OF AMERICA

vs.

JOAQUIN JESUS MARANON  
MARCO ANTONIO ZUNIGA  
FRANK FLORES  
BEVERLY ANN MOSLEY  
CHANCE WAYNE NUTT  
CLIFTON DWAYNE JOHNSON

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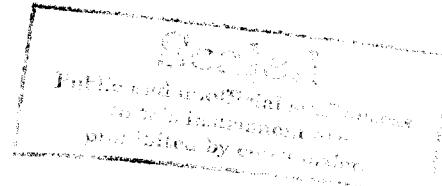
CRIMINAL NO.

16 CR 0273

FILED UNDER SEAL

INDICTMENT

THE GRAND JURY CHARGES THAT:



COUNT ONE

Conspiracy to Possess with the Intent to Distribute a Controlled Substance

From on or about July 1, 2014, through November 17, 2015, in the Southern District of Texas, and elsewhere,

JOAQUIN JESUS MARANON,  
MARCO ANTONIO ZUNIGA,  
FRANK FLORES,  
BEVERLY ANN MOSLEY,  
CHANCE WAYNE NUTT, and  
CLIFTON DWAYNE JOHNSON

defendants herein, did unlawfully, knowingly, and intentionally, combine, conspire, confederate, and agree with each other and others, known and unknown to the Grand Jury, to possess with the intent to distribute a controlled substance. The overall scope of the conspiracy involved 50

grams or more of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), 841(b)(1)(A)(viii).

**COUNT TWO**

**Possession with Intent to Distribute a Controlled Substance**

On or about November 20, 2014, in the Southern District of Texas,

BEVERLY ANN MOSLEY

defendant herein, aided and abetted by others known and unknown to the Grand Jury, did knowingly and unlawfully possess with the intent to distribute a controlled substance. This violation involved 50 grams or more of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii) and Title 18, United States Code, Section 2.

**COUNT THREE**

**Possession with Intent to Distribute a Controlled Substance**

On or about March 24, 2015, in the Southern District of Texas,

BEVERLY ANN MOSLEY

defendant herein, aided and abetted by others known and unknown to the Grand Jury, did knowingly and unlawfully possess with the intent to distribute a controlled substance. This violation involved 50 grams or more of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii) and Title 18, United States Code, Section 2.

**COUNT FOUR**

**Possession with Intent to Distribute a Controlled Substance**

On or about July 15, 2015, in the Southern District of Texas,

FRANK FLORES,  
BEVERLY ANN MOSLEY

defendants herein, aided and abetted each other and by others known and unknown to the Grand Jury, did knowingly and unlawfully possess with the intent to distribute a controlled substance. This violation involved 50 grams or more of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii) and Title 18, United States Code, Section 2.

**COUNT FIVE**

**Possession with Intent to Distribute a Controlled Substance**

On or about November 4, 2015, in the Southern District of Texas,

JOAQUIN JESUS MARANON,  
MARCO ANTONIO ZUNIGA,  
FRANK FLORES,  
BEVERLY ANN MOSLEY,  
CHANCE WAYNE NUTT,  
CLIFTON DWAYNE JOHNSON

defendants herein, aided and abetted each other and by others known and unknown to the Grand Jury, did knowingly and unlawfully possess with the intent to distribute a controlled substance. This violation involved 50 grams or more of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii) and

Title 18, United States Code, Section 2.

**COUNT SIX**

**Possession with Intent to Distribute a Controlled Substance**

On or about November 17, 2015, in the Southern District of Texas,

JOAQUIN JESUS MARANON,

defendant herein, aided and abetted each other and by others known and unknown to the Grand Jury, did knowingly and unlawfully possess with the intent to distribute a controlled substance. This violation involved 50 grams or more of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii) and Title 18, United States Code, Section 2.

**Notice of Criminal Forfeiture**

Pursuant to Title 21, United States Code, Section 853, the United States gives notice to defendants:

JOAQUIN JESUS MARANON,  
MARCO ANTONIO ZUNIGA,  
FRANK FLORES,  
BEVERLY ANN MOSLEY,  
CHANCE WAYNE NUTT,  
CLIFTON DWAYNE JOHNSON

that, in the event of conviction of an offense in violation of Title 21, United States Code, Sections 841 or 846, the following is subject to forfeiture:

- (1) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation; and

(2) all property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violations.

**Money Judgment**

Defendants are notified that in the event of conviction, a money judgment may be imposed equal to the total value of the property subject to forfeiture.

**Substitute Assets**

Defendants are notified that in the event that property subject to forfeiture, as a result of any act or omission of the defendants,

- (1) cannot be located upon exercise of due diligence;
- (2) has been placed beyond the jurisdiction of the Court;
- (3) has been transferred or sold to, or deposited with, a third party;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

the United States will seek to forfeit any other property of the defendants up to the total value of the property subject to forfeiture, pursuant to Title 21, United States Code, Section 853(p).

**A TRUE BILL**

Original Signature on File

**FOREPERSON OF THE GRAND JURY**

**KENNETH MAGIDSON  
UNITED STATES ATTORNEY  
SOUTHERN DISTRICT OF TEXAS**

By:

Robert Stabe

Robert Stabe  
Assistant United States Attorney  
Southern District of Texas  
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